

From: [Rafael Casanova](#)
To: [Gary Miller](#)
Cc: [Carlos Sanchez](#); [Anne Foster](#); [Susan Roddy](#); [Dipanjana Bhattacharya](#)
Subject: Gulfco Draft Final Proposed Plan
Date: 06/24/2011 04:48 PM
Attachments: [Figure 2.pdf](#)
[Gulfco Proposed Plan 062411.doc](#)
[Gulfco Proposed Plan 062411.pdf](#)
[Figure 1.pdf](#)
[Gulfco Fact Sheet for RA 062411.doc](#)

Gary, attached is the Draft Final Proposed Plan. I included the MS Word and pdf files, along with Figures 1 and 2. Also, as requested, I have included the Executive Summary for any briefings you may need.






I incorporated as many comments as I could from HQs, TCEQ, and EPA staff. As you know, several comments were not incorporated. Without any specific recommended text I was uncertain on what to amend or delete. The comments I did not incorporate have been outlined in previous e-mails and telephone conversations. I drafted the Proposed Plan based on guidance and discussions held during NARPM conference sessions concerning Proposed Plans. I believe this draft incorporates the minimal amount of information needed for this Proposed Plan. Please revise as you deem appropriate.

The discussion on ARARs, as requested by HQs and counsel, added two pages to the Proposed Plan, so please take another look at the ARARs' sections and delete/add text as appropriate. Without any specific recommended text, I was uncertain how much detail the commentors requested on ARARs.

HQs had comments on the 5% discount rate included in the Proposed Plan, which I derived from the FS Report. Is that a typo in the FS that should be 7%? If so, please make that change in the Proposed Plan.

Also, if the length of the Proposed Plan is a concern, delete the glossary. This will eliminate four pages. If this is done, remember to remove the bold-faced type for the terms included in the glossary from the Proposed Plan.

Let me know if you need anything else.

   
Figure 2.pdf Gulfco Proposed Plan 062411.doc Gulfco Proposed Plan 062411.pdf Figure 1.pdf

Gulfco Fact Sheet for RA 062411.doc

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Assigned Sites for Investigation and Remediation:

(<http://www.epa.gov/earth1r6/6sf/6sf-tx.htm>):

Brine Service Company Superfund Site (Corpus Christi, Texas)

Falcon Refinery Superfund Site (Ingleside, Texas)

Many Diversified Interests, Inc. Superfund Site (Houston, Texas)

Palmer Barge Line Superfund Site (Port Arthur, Texas)

State Marine of Port Arthur Superfund Site (Port Arthur, Texas)